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701—50.10 (422) Example for tax periods beginning on or after January 1, 2002.

EXAMPLE. The following example is based on the following facts. The taxpayers are a husband and wife who have two dependent children. Their income consists of husband's wages of \$50,000; rental loss (\$5,000); wife's S corporation income of \$500,000; joint interest income of \$35,000. They have Iowa itemized deductions of \$20,000, and an out-of-state tax credit of \$1,150 on the S corporation income. The actual cash distribution from the S corporation was \$289,840, none of which has been previously taxed by Iowa. Federal income tax paid during the year totals \$191,214. The S corporation is a value-added corporation which carries on business within and without Iowa with 10 percent of its sales in Iowa.

a. Computation of tax on a joint return basis.

Wages	\$50,000
S corporation income	500,000
Interest	35,000
Rent	(5,000)
Total income	\$580,000
Less federal tax deduction	(191,214)
Subtotal	\$388,786
Less itemized deductions	(20,000)
Taxable income	\$368,786
Tax	,
	\$31,696
Less personal credits husband & wife & two dependents	<u>(160)</u>
Subtotal	\$31,536
Less out-of-state tax credit	(1,150)
Iowa individual tax	\$30,386
	Ψ30,300
Computation of credit	
Total income	\$580,000
Less S corporation income	(500,000)
Subtotal	\$80,000
Add the greater of cash distributions not previously taxed, \$289,840 less 100% of federal taxes on S corporation income of \$164,840 = \$125,000, or income attributable to Iowa sources \$50,000	125,000
T	

Income attributable to Iowa sources

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	\$205,000
Total income	\$580,000
Taxable percentage	
Iowa individual tax before credit	35.3449%
iowa ilidividuai tax before credit	\$31,696
Credit percentage	64.6551%
Subtotal	\$20,493
Less out-of-state tax credit	(1,150)
S corporation tax credit	(1,130)
S corporation tax credit	\$19,343

Computation of 100 percent of federal income tax attributable to S corporation income: $\$191,214 \times \$500,000 / \$580,000 = \$164,840$.

Computation of percent of income attributable to Iowa sources: $100 \times \$205,000 / \$580,000 = 35.3449\%$.

Computation of percent of income attributable to non-Iowa sources: 100 - 35.3449% = 64.6551%.

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b. Computation on a separate filing on a combined return basis.

	Spouse	Taxpayer
Wages	\$50,000	-0-
S corporation income	-0-	\$500,000
Interest	17,500	17,500
Rent		
Total income	(5,000)	<u>-0-</u>
Less federal tax deduction	\$62,500	\$517,500
Subtotal	(20,613)	(170,601)
	\$41,887	\$346,899
Less itemized deductions	(2,156)	(17,844)
Taxable income	\$39,731	\$329,055
Tax	\$2,293	\$28,128
Less personal credits taxpayer & spouse & two dependents	(120)	<u>(40)</u>
Subtotal	\$2,173	\$28,088
Less out-of-state tax credit	(-0-)	(1,150)
Iowa individual tax	\$2,173	\$26,938
Computation of credit		
Total income		
	\$517,500	
Less S corporation income	(500,000)	
Subtotal	\$17,500	
Add the greater of cash distributions not previously taxed, \$289,840 less 100% of federal taxes on S corporation income of \$164,840 = \$125,000, or income attributable to Iowa sources \$50,000	125,000	
Income attributable to Iowa sources	\$142,500	
Total income		
	\$517,500	

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Taxable percentage	
Tuxuote percentage	27.5362%
Iowa individual tax before credit	\$28,128
Credit percentage	72.4638%
Subtotal	\$20,383
Less out-of-state tax credit	(1,150)
S corporation tax credit	\$19,233

Taxpayer's computation of 100 percent of federal income tax attributable to S corporation income: $\$170,601 \times \$500,000 / \$517,500 = \$164,832$.

Taxpayer's computation of percent of income attributable to Iowa sources: $100 \times $142,500 / $517,500 = 27.5362\%$.

Taxpayer's computation of percent of income attributable to non-Iowa sources: 100 - 27.5362% = 72.4638%.

This rule is intended to implement Iowa Code section 422.8, subsection 2, paragraph "b."

[ARC 1102C, IAB 10/16/13, effective 11/20/13]